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OCT 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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October 16, 2001

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Ex Parte Communication

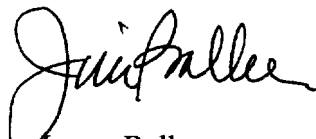
Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
8th Floor
Washington, DC 20554

Re: In the Matter of Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming Notice of Inquiry, CS Docket No. 01-129

Dear Salas:

Please accept for filing an original and two copies of the Scottsboro (Alabama) Electric Power Board's Answer to the Reply Comments of Charter Communications, Inc. in the docket listed in the caption above. Please also stamp and return to the messenger the additional copy of this filing.

Sincerely,


James Baller

Enclosure

Paul Glist and Sandra Gibbs,
Counsel to Charter Communications, Inc.

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Before the
Federal Communications Commission
Washington, D.C. 20554

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OCT 16 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)
)
Annual Assessment of the Status of) CS Docket No. 01-129
Competition in the Market for the)
Delivery of Video Programming)

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To the Commission:

**SCOTTSBORO ELECTRIC POWER BOARD'S ANSWER TO
THE REPLY COMMENTS OF CHARTER COMMUNICATIONS, INC.**

In its opening submission, the Scottsboro (Alabama) Electric Power Board (SEPB) showed that Charter Communications has mounted an economically irrational campaign of below-cost predatory pricing in Scottsboro that can have no purpose other than to destroy competition from SEPB and send out a chilling message to prospective competitors in other markets. SEPB also discussed various ways in which the Commission could act forcefully to stop Charter's anti-competitive efforts. Alternatively, SEPB urged the Commission to seek any additional authority that it may believe that it needs to prevent and punish conduct such as Charter's.

In its reply, Charter does not contest *any* of the facts that SEPB has presented. Rather, Charter makes three arguments: (1) "SEPB's half-hearted effort to demonstrate 'predatory pricing' misses the mark by far: it has lumped into the supposed 'costs' in Scottsboro a wide array of fixed costs that have no place in applicable FCC or antitrust analysis – such as overhead and management costs, marketing, advertising, and even cost of stock options," Charter's Reply at 2; (2) Charter's practice of offering "deep discounts" in Scottsboro is part of a "rational" market-by-market pricing campaign, and it is "simply competition" that benefits consumers, *Id.* at 2-4; and (3) the Commission is helpless to do anything about Charter's practices because "[t]he Commission has consistently confined the scope of [Section 628(b) of the Communications Act] to its original purpose, rather than transforming it into a 'mini-FTC Act,' under

which all claims of supposed ‘unfair methods of competition’ would be adjudicated by the FCC.” *Id.* at 3.

SEPB has addressed Charter’s third point and will stand on what it has already said. SEPB does, however, wish to respond to Charter’s other two points.

First, in preparing in its opening comments, SEPB used national average cost data taken from Charter’s published statements because that is all that was available to SEPB. To be sure, this data may include some costs that would not be usable in a formal anti-trust case. For several reasons, however, Charter’s losses in Scottsboro are likely to be far greater than Scottsboro conservatively estimated using these national data.

First, in determining whether discounts to multi-dwelling units (MDUs) are predatory, the FCC considers “whether a cable operator’s price to an MDU recovers at least the incremental costs of serving that MDU, including any new costs from constructing or upgrading its physical facilities in order to offer the bulk service agreed to with the building’s owner or manager, and whether the cable operator has a reasonable prospect of recouping its investment in below cost prices in the MDU.” *In the Matter of Implementation of Cable Act Reform Provisions of the Telecommunications Act of 1996*, ¶ 108. 14 FCC Rcd. 5296, 1999 WL 169592 (F.C.C.).¹ As applied to Scottsboro, Charter has incurred substantial new construction and upgrade costs to be able to offer many of the premium services at issue, so Charter’s costs per subscriber in Scottsboro are likely to be considerably higher than its average costs per subscriber nationwide.

Second, in its zeal to drive SEPB out of the market, Charter has mounted at least six door-to-door marketing campaigns in many of Scottsboro’s neighborhoods over the last two years. The costs of these efforts, too, are likely to be much higher than Charter’s marketing costs nationwide.

¹ SEPB cites this language not for its specific application to MDUs, but for the general principle that it embodies.

Third, while there may be room to debate whether certain costs should be included in determining whether Charter's prices in Scottsboro are predatory, there can be no question that it is appropriate – indeed, essential – to consider Charter's programming costs. Because SEPB does not have access to Charter's programming costs, it has estimated them by using the rates that the National Cable Television Cooperative (NCTC) charges for the same services to operators that collectively serve approximately 12 million subscribers. Since has Charter's 6.3 to 7.0 million subscribers, its costs are not likely to be much lower than NCTC's rates – if they are lower at all.

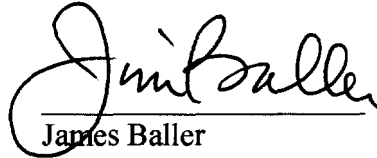
As the attached spreadsheet indicates, Charter's cost would be \$36.85 per month for the programming that it offers in Scottsboro for \$24.95 or \$19.95 a month, depending on when the subscriber began to receive service.² That amounts to a loss of \$11.90 for customers paying \$24.95 a month and \$16.90 for customers paying \$19.95 a month. These losses, moreover, do not take into account (1) any of Charter's other operating and maintenance costs attributable to the Scottsboro market; (2) Charter's payments of \$200 to induce SEPB's customers to switch to Charter's cable and an additional \$200 to induce SEPB's customers to switch their high-speed Internet service; and (3) the principal and interest on the past debts that Charter forgiven under the amnesty program that Charter has mounted to put additional pressure on SEPB's customers to switch.

Thus, by any measure, Charter is losing money in Scottsboro “by the bucket,” and it cannot have any reasonable expectation of recovering these losses while SEPB is active in the market. Of course, if SEPB fails, there will be nothing to stop Charter from raising its rates to the \$72.90 - \$77.90 levels that it is charging in nearby communities. That is not “rational” or “simply competition,” as Charter claims. It is the essence of predatory pricing.

² SEPB does not know precisely what the customers it lost to Charter are paying. It is possible that as many as two-thirds of the 1778 customers that SEPB has lost to Charter since March 2000 are paying \$19.95 a month.

If you have questions or need additional information, please do not hesitate to contact me by letter or telephone.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jim Baller". The signature is written in black ink and is positioned above a horizontal line.

James Baller

Sean A. Stokes

The Baller Herbst Law Group, P.C.

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Counsel for Scottsboro Electric Power Board

October 16, 2001

**CHARTER COMMUNICATIONS, INC.
ESTIMATED PROGRAMMING COSTS
SCOTTSBORO, ALABAMA**

Charter Full Package Rate Scottsboro, Alabama:	\$24.95
Charter Total Estimated Programming Cost for Full Package:	\$36.85
Charter Profit/Loss Per Subscriber After Programming Costs:	(\$11.90)

<u>Channel</u>	<u>Service</u>	<u>Tier</u>	<u>Est. Cost/ Subscriber</u>	<u>Total Cost/ Service Tier</u>
2	Local/Public Access	Analog Basic	\$0.0000	
3	WRCB-TV	Analog Basic	\$0.0000	
4	WHNT-TV	Analog Basic	\$0.0000	
5	WAAY-TV	Analog Basic	\$0.0000	
6	WZDX	Analog Basic	\$0.0000	
7	WHIQ	Analog Basic	\$0.0000	
8	NASA	Analog Basic	\$0.0000	
9	WTVC	Analog Basic	\$0.0000	
10	Local/Public Access	Analog Basic	\$0.0000	
11	WAFF	Analog Basic	\$0.0000	
12	WDEF-TV	Analog Basic	\$0.0000	
13	PAX Network	Analog Basic	\$0.0900	
14	CSPAN	Analog Basic	\$0.0600	
15	EWTN	Analog Basic	\$0.0000	
16	Inspirational Network	Analog Basic	\$0.0000	

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<u>Channel</u>	<u>Service</u>	<u>Tier</u>	<u>Est. Cost/ Subscriber</u>	<u>Total Cost/ Service Tier</u>
17	The Weather Channel	Analog Basic	\$0.1490	
18	Food Network	Analog Basic	\$0.0850	
19	QVC	Analog Basic	\$0.0000	
20	Home Shopping Network	Analog Basic	\$0.0000	
21	TV Guide	Analog Basic	\$0.0300	
22	HGTV/Home and Garden Television	Analog Basic	\$0.1350	
23	TBS	Expanded Basic	\$0.2600	
24	WGN	Expanded Basic	\$0.1300	
25	FOX Family	Expanded Basic	\$0.1740	
26	TNT	Expanded Basic	\$0.6600	
27	AMC	Expanded Basic	\$0.2450	
28	ESPN	Expanded Basic	\$1.5098	
29	ESPN2	Expanded Basic	\$0.3286	
30	The Disney Channel	Expanded Basic	\$0.8250	
31	CNN	Expanded Basic	\$0.3590	

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<u>Channel</u>	<u>Service</u>	<u>Tier</u>	<u>Est. Cost/ Subscriber</u>	<u>Total Cost/ Service Tier</u>
32	fx	Expanded Basic	\$0.2886	
33	A&E	Expanded Basic	\$0.2450	
34	CNN Headline News	Expanded Basic	\$0.0000	
35	The Learning Channel	Expanded Basic	\$0.1458	
36	Sci-Fi	Expanded Basic	\$0.1400	
37	Nickelodeon-East	Expanded Basic	\$0.3957	
38	Fox Sports Net South	Expanded Basic	\$0.6800	
39	E!	Expanded Basic	\$0.1320	
40	USA	Expanded Basic	\$0.4500	
41	Cartoon Network	Expanded Basic	\$0.1128	
42	Toon Disney	Expanded Basic	\$0.0800	
43	The Discovery Channel	Expanded Basic	\$0.3048	
44	History	Expanded Basic	\$0.1750	
45	CNBC	Expanded Basic	\$0.1900	
46	Animal Planet	Expanded Basic	\$0.1496	

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Channel	Service	Tier	Est. Cost/ Subscriber	Total Cost/ Service Tier
47	Lifetime	Expanded Basic	\$0.3200	
48	VH-1	Expanded Basic	\$0.1220	
49	Comedy Central	Expanded Basic	\$0.1575	
50	Turner South	Expanded Basic	\$0.2000	
51	CMT	Expanded Basic	\$0.1000	
52	BET	Expanded Basic	\$0.1600	
53	MTV	Expanded Basic	\$0.2950	
54	MSNBC	Expanded Basic	\$0.1200	
55	CSPAN2	Expanded Basic	\$0.0000	
56	Soap Net	Expanded Basic	\$0.0000	
57	Oxygen	Expanded Basic	\$0.2170	
58	TV Land	Expanded Basic	\$0.1000	
59	techtv (ZDTV)	Expanded Basic	\$0.0000	
60	The National Network	Expanded Basic	\$0.3100	
61	Charter Southeast Sports	Expanded Basic	\$0.2600	

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62	FOX News Channel	Expanded Basic	\$0.2200	
63	Outdoor Channel	Expanded Basic	\$0.0630	
64	Speedvision	Expanded Basic	\$0.1620	
65	Outdoor Life Channel	Expanded Basic	\$0.1800	
66	Golf Channel	Expanded Basic	\$0.2000	
67	Women's Entertainment (Romance)	Expanded Basic	\$0.1300	
68	The Travel Channel	Expanded Basic	\$0.0750	
69	fx Movies	Expanded Basic	\$0.3000	
70	National Geographic	Expanded Basic	\$0.1500	
Total	Basic + Expanded Basic			\$12.37
99	SARA/Scientific Atlanta	Digital Basic	\$0.0000	
100	BBC America	Digital Family Choice	\$0.0000	
101	Discovery Home & Leisure	Digital Family Choice	\$0.0800	

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102	Discovery Wings	Digital Family Choice	\$0.0800	
103	Discovery En Espanol	Digital Family Choice	\$0.0000	
104	Do It Yourself	Digital Family Choice	\$0.0000	
105	Discovery Kids	Digital Family Choice	\$0.0800	
200	Lifetime Movie Network	Digital Movies & More Choice	\$0.1500	
201	Independent Film Channel	Digital Movies & More Choice	\$0.1500	
202	Outdoor Life Channel	Digital Movies & More Choice	\$0.0000	
203	Biography	Digital Movies & More Choice	\$0.2100	
204	History Channel International	Digital Movies & More Choice	\$0.1100	
205	Sundance-East	Digital Movies & More Choice	\$0.2750	

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300	Discovery Science	Digital News & Information	\$0.0800	
301	Discovery Health	Digital News & Information	\$0.0800	
303	Discovery Civilization	Digital News & Information	\$0.0800	
Total	Basic Digital			\$1.38
400	HBO-East	Digital Premium	\$7.8300	
401	HBO Plus-East	Digital Premium		
402	HBO Signature-East	Digital Premium		
403	HBO Family-East	Digital Premium		
450	Cinemax-East	Digital Premium	\$3.1300	
451	More Max-East	Digital Premium		
452	Action Max-East	Digital Premium		
500	Showtime-East	Digital Premium	\$7.5400	
501	FLIX-E	Digital Premium		

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503	Showtime Too-East	Digital Premium		
504	SHOW3-E	Digital Premium		
505	Showtime Extreme-East	Digital Premium		
506	Showtime Beyond-East	Digital Premium		
550	The Movie Channel - East	Digital Premium	\$4.6000	
551	TMC Xtra-East	Digital Premium		
600	Starz!-East	Digital Premium	Not Included	
601	Starz!-West	Digital Premium		
602	Starz!2-East	Digital Premium		
603	Black Starz!-East	Digital Premium		
604	Starz! 4 Family-East	Digital Premium		
650	Encore-East	Digital Premium	Not Included	
651	Encore-West	Digital Premium		
652	Encore Westerns-East	Digital Premium		
653	Encore Mystery-East	Digital Premium		

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654	WAMI-East	Digital Premium		
Total	All Premiums			\$23.10
800	INDEMAND Barker-A	Digital PPV		
801	IN DEMAND 1	Digital PPV		
802	IN DEMAND 2	Digital PPV		
803	IN DEMAND 3	Digital PPV		
804	IN DEMAND 4	Digital PPV		
805	IN DEMAND 5	Digital PPV		
806	IN DEMAND 6	Digital PPV		
831	IN DEMAND 31	Digital PPV		
832	IN DEMAND 32	Digital PPV		
833	IN DEMAND 33	Digital PPV		
834	IN DEMAND 34	Digital PPV		
835	Hot Choice	Digital PPV		
897	Spice	Digital Adult - PPV		

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898	Spice 2	Digital Adult - PPV		
899	Playboy	Digital Adult - PPV		
901	MC - Showcase 1	Music Audio (Digital Converter)		
902	MC - Showcase 2	Music Audio (Digital Converter)		
903	MC - Origins	Music Audio (Digital Converter)		
904	MC - New Releases	Music Audio (Digital Converter)		
905	MC - Americal Originals	Music Audio (Digital Converter)		
906	MC - Sound of the Seasons	Music Audio (Digital Converter)		
907	MC - For Kids Only	Music Audio (Digital Converter)		
908	MC - World Beat	Music Audio (Digital Converter)		
909	MC - Body & Soul	Music Audio (Digital Converter)		

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910	MC - Classic R&B	Music Audio (Digital Converter)		
911	MC - R&B Hits	Music Audio (Digital Converter)		
912	MC - Dance	Music Audio (Digital Converter)		
913	MC - Rap	Music Audio (Digital Converter)		
914	MC - Metal	Music Audio (Digital Converter)		
915	MC - Alternative Rock	Music Audio (Digital Converter)		
916	MC - Progressive	Music Audio (Digital Converter)		
917	MC - Classic Rock	Music Audio (Digital Converter)		
918	MC - Rock Hits	Music Audio (Digital Converter)		
919	MC - Soft Rock	Music Audio (Digital Converter)		

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920	MC - Hit List	Music Audio (Digital Converter)		
921	MC - 80s	Music Audio (Digital Converter)		
922	MC - 70s	Music Audio (Digital Converter)		
923	MC - Solid Gold Oldies	Music Audio (Digital Converter)		
924	MC - Today's Country	Music Audio (Digital Converter)		
925	MC - Classic Country	Music Audio (Digital Converter)		
926	MC - Big Band	Music Audio (Digital Converter)		
927	MC - Singers & Standards	Music Audio (Digital Converter)		
928	MC - Easy Listening	Music Audio (Digital Converter)		
929	MC - Classical Masterpieces	Music Audio (Digital Converter)		

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930	MC - Light Classical	Music Audio (Digital Converter)		
931	MC - Atmospheres	Music Audio (Digital Converter)		
932	MC - Light Jazz	Music Audio (Digital Converter)		
933	MC - Jazz	Music Audio (Digital Converter)		
934	MC - Blues	Music Audio (Digital Converter)		
935	MC - Gospel	Music Audio (Digital Converter)		
936	MC - Contemporary Christian	Music Audio (Digital Converter)		
937	MC - Musica Latina	Music Audio (Digital Converter)		
938	MC - Tropical	Music Audio (Digital Converter)		
939	MC - Mexicana	Music Audio (Digital Converter)		

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940	MC - Tejano	Music Audio (Digital Converter)		
941	MC - Folklorica	Music Audio (Digital Converter)		
942	MC - Boleros	Music Audio (Digital Converter)		
943	MC - International Love Songs	Music Audio (Digital Converter)		
944	MC - Brazillian Pop	Music Audio (Digital Converter)		
945	MC - Brazillian Beat	Music Audio (Digital Converter)		

***Note: Programming costs have been derived from the NCTC, representing 12 million subscribers, and directly from programmers.**